

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

NORTH CAROLINA STATE CONFERENCE
OF THE NAACP, et al.,

Plaintiffs,

v.

PATRICK LLOYD MCCRORY, in his official
capacity as the Governor of North Carolina, et al.,

Defendants.

Case No.: 1:13-CV-658

LEAGUE OF WOMEN VOTERS OF
NORTH CAROLINA, et al.,

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA, et al.,

Defendants.

Case No.: 1:13-CV-660

UNITED STATES OF AMERICA,

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA, et al.,

Defendants.

Case No.: 1:13-CV-861

PLAINTIFFS' JOINT APPENDIX TO MOTION FOR PRELIMINARY INJUNCTION

TABLE OF CONTENTS OF APPENDICES

	Page
Volume I	
Declarations of Plaintiffs	JA0001
Declarations of Fact Witnesses	JA0135
Deposition Transcripts	JA0453
Volume II	
Expert and Sur-Rebuttal Expert Reports.....	JA0591
Volume III	
Expert and Sur-Rebuttal Expert Reports	JA1036
Volume IV	
Exhibits Cited in The Briefs in Support of Preliminary Injunction	JA1468
Volume V	
Legislative, Administrative, and Court Documents	
Bill History.....	JA2101
Amendments	JA2340
Bill History, Roll Call Votes, and Other Materials.....	JA2354
Excerpts of Transcripts	JA2388
Federal Legislative, Administrative, and Court Documents	JA2627
Other North Carolina Legislative Documents	JA2656

VOLUME I

Plaintiff Declarations, Fact Witness Declarations, and Deposition Transcript Excerpts

Tab	JA Page Number(s)	Description
Plaintiff Declarations		
1.	JA0001 - JA0009	Kay Gordon Brandon (April 25, 2014)
2.	JA0010 - JA0013	Sarah Bufkin (May 15, 2014)
3.	JA0014 - JA0021	Bessie Carrington (April 25, 2014)
4.	JA0022 - JA0029	Masac Dorlouis (April 28, 2014)
5.	JA0030 - JA0037	Plaintiff Rosanell Eaton (May 1, 2014)
6.	JA0038 - JA0048	Plaintiff Armenta Eaton (May 14, 2014)
7.	JA0049 - JA0051	Nicole Little (May 14, 2014)
8.	JA0052 - JA0060	Renee Michaux (April 25, 2014)
9.	JA0061 - JA0067	Melvin Montford (April 27, 2014)

Tab	JA Page Number(s)	Description
10.	JA0068 - JA0085	NAACP (May 16, 2014)
11.	JA0086 - JA0095	Plaintiff Maria Teresa Unger Palmer (April 29, 2014)
12.	JA0096 - JA0110	Bob Phillips (April 28, 2014)
13.	JA0111 - JA0117	Octavia Rainey (April 28, 2014)
14.	JA0118 - JA0126	Hugh Stohler (April 24, 2014)
15.	JA0127 - JA0134	Goldie Wells (April 28, 2014)
Fact Witness Declarations		
16.	JA0135 - JA0158	Gary Bartlett (April 24, 2014)
17.	JA0159 - JA0176	Henry M. Michaux (April 23, 2014)
18.	JA0177 - JA0215	Joshua Stein (May 1, 2014)
19.	JA0216 - JA0233	George Gilbert (April 15, 2014)

Tab	JA Page Number(s)	Description
20.	JA0234 - JA0247	Alma Adams (April 28, 2014)
21.	JA0248 - JA0258	Daniel T. Blue, Jr. (May 8, 2014)
22.	JA0259 - JA0268	Larry D. Hall (May 9, 2014)
23.	JA0269 - JA0286	Earline Parmon (April 29, 2014)
24.	JA0287 - JA0296	Shelly Willingham (April 24, 2014)
25.	JA0297 - JA0320	Rick Glazier (March 26, 2014)
26.	JA0321 - JA0336	Mary Price Taylor Harrison (April 1, 2014)
27.	JA0337 - JA0351	Kenneth Goodman (April 24, 2014)
28.	JA0352 - JA0370	Floyd McKissick (April 2, 2014)
29.	JA0371 - JA0383	Eleanor Kinnaird (April 29, 2014)
30.	JA0384 - JA0393	Angela R. Bryant (May 14, 2014)

Tab	JA Page Number(s)	Description
31.	JA0394 - JA0412	Grier Martin (March 25, 2014)
32.	JA0413 - JA0419	Jacqueline Taylor (April 16, 2014)
33.	JA0420 - JA0426	Marilyn Harris (April 16, 2014)
34.	JA0427 - JA0433	Harry L. Sawyer (April 28, 2014)
35.	JA0434 - JA0445	Ion V. Sancho (April 29, 2014)
36.	JA0446 - JA0452	Dawson Blaire Gould (April 27, 2014)
Deposition Transcripts		
37.	JA0453 - JA0539	Deposition Transcript of Kim Strach taken April 16, 2014
38.	JA0540 - JA0590	Deposition Transcript of Marc Burris taken April 17, 2014
39.	-	CD enclosing Complete Transcripts of Kim Strach and Marc Burris

VOLUME II

Expert and Sur-Rebuttal Expert Reports

Tab	JA Page Number(s)	Description
40.	JA0591 - JA0684	Paul Gronke Amended Expert Report (April 14, 2014) and Sur-Rebuttal Report (May 2, 2014)
41.	JA0685 - JA0778	Alan Lichtman Expert Report (April 11, 2014) and Sur-Rebuttal Report (May 2, 2014)
42.	JA0779 - JA1035	Charles Stewart Expert Report (April 11, 2014) and Sur-Rebuttal Report (May 2, 2014)

VOLUME III

Expert and Sur-Rebuttal Expert Reports

Tab	JA Page Number(s)	Description
43.	JA1036 - JA1092	Lorraine Minnite Expert Report (April 11, 2014)
44.	JA1093 - JA1141	Barry Burden Expert Report (April 11, 2014) and Sur-Rebuttal Report (May 2, 2014)
45.	JA1142 - JA1175	Cynthia Duncan Expert Report (April 10, 2014)
46.	JA1176 - JA1246	J. Morgan Kousser Report (April 10, 2014)
47.	JA1247 - JA1337	Steven Lawson Expert Report (April 11, 2014) and Sur-Rebuttal Report (May 2, 2014)
48.	JA1338 - JA1399	James Leloudis Expert Report (April 11, 2014) and Sur-Rebuttal Report (May 2, 2014)
49.	JA1400 - JA1428	Theodore Allen Expert Report (April 11, 2014)
50.	JA1429 - JA1467	Peter Levine, Seth Avakian, and Kei Kawashima-Ginsberg Expert Report (April 11, 2014)

VOLUME IV

Exhibits

Tab	JA Page Number(s)	Description
51.	JA1468 - JA1475	State Board of Elections report re Traffic Jam: Election Day Long Lines (February 13, 1997)
52.	JA1476 - JA1523	<i>Distribution of Licensed Drivers- 2006 by Sex and Percentage in Each Age Group and Relation to Population</i> , a report of the US Department of Transportation Federal Highway Administration
53.	JA1524	Letter from Stevie Lawrence to Larry Shaw re Early Voting for Fayetteville State University Students (July 14, 2008)
54.	JA1525	State Board of Elections Memorandum to County Board of Elections re One-Stop Absentee Voting Hours - November 1, 2008 (2008-25) (October 30, 2008)
55.	JA1526 - JA1527	<i>Voting Rights Watch: NAACP Wants Probe After Casket with Obama Picture is Displayed N.C. Polling Station</i> , Institute for Southern Studies article (November 3, 2008)
56.	JA1528 - JA1536	State Board of Elections Report on Implementation of Same Day Registration (March 31, 2009)
57.	JA1537	Same Day Registration Summary: 2010 General Election
58.	JA1538 - JA1539	Memorandum re State Board of Elections and North Carolina Department of Motor Vehicles Voter Registration Database Identification Analysis (February 9, 2011)
59.	JA1540	Memorandum re State Board of Elections and North Carolina Department of Motor Vehicles Voter Registration Database Identification Analysis (February 16, 2011)
60.	JA1541 - JA1543	State Board of Elections Memorandum re House Bill 658 (May 18, 2011)

Tab	JA Page Number(s)	Description
61.	JA1544	State Board of Elections Numbered Memorandum re Proof of Residence for Same Day Registrants (2012-20) (August 28, 2012)
62.	JA1545 - JA1546	State Board of Elections Numbered Memorandum re Recommendations and Reminders to Facilitate the 2012 One-Stop Voting Process (2012-22) (October 22, 2012)
63.	JA1547	State Board of Elections Numbered Memorandum re 2012 One-Stop Voting Process (2012-23) (October 23, 2012)
64.	JA1548 - JA1550	<i>Justice Department to Monitor Polls in 23 States on Election Day</i> , U.S. Department of Justice Press Release (November 2, 2012)
65.	JA1551 - JA1610	<i>All Together Now: Collaboration and Innovation for Youth Engagement</i> , A report of the Commission on Youth Voting and Civic Knowledge
66.	JA1611 - JA1613	State Board of Elections 2013 Department of Motor Vehicles Identification Analysis (January 7, 2013)
67.	JA1614 - JA1620	State Board of Elections Analysis of Same Day Registrations in 2012 Primary and General Election (January 30, 2013)
68.	JA1621 - JA1626	State Board of Elections Data from the 2012 Elections: Mail Verification Analysis of New Voters (February 11, 2013)
69.	JA1627 - JA1668	Emails from Sponsors of H.B. 589 to SBOE re: Data on Photo ID, One-Stop and Provisional Voting by Race, Age, Gender
70.	JA1669 - JA1675	Email from V. Degraffenreid to G. Bartlett, J. McLean and M. Burris attaching January 2013 DMV ID Matching Report and March 2013 Supplemental Report (March 5, 2013)
71.	JA1676 - JA1709	State Board of Elections Memorandum & Attachments to House Elections Committee and House Appropriations Subcommittee on General Government

Tab	JA Page Number(s)	Description
72.	JA1710 - JA1781	Email from V. Degraffenreid to Representatives Warren, Murry, and Samuelson re Request (March 12, 2013)
73.	JA1782 - JA1785	Email from G. Bartlett to S. Mooneyham re Supplemental Tables for Representative Warren (March 13, 2013)
74.	JA1786 - JA1797	Spreadsheet of Racial Data Prepared at the Request of Rep. D. Lewis
75.	JA1798 - JA1807	State Board of Elections Numbered Memos 4-578 to 4-596 re Early Voting Project (April 1, 2013)
76.	JA1808 - JA1812	<i>Bill Cook Seeks to Put Integrity Back in Our Elections Procedures</i> , Beaufort Observer article (April 3, 2013)
77.	JA1813 - JA1816	<i>House Republicans File Voter ID Bill</i> , WRAL.com article (April 4, 2013)
78.	JA1817	Email from E. Churchill to G. Bartlett, J. McLean, V. Degraffenreid, and M. Burris re Absentee Ballots (April 8, 2013)
79.	JA1818 - JA1820	<i>NC Bills Could Cut Early Voting, Affect College Students</i> , Lumina News Article (April 10, 2013)
80.	JA1821 - JA1830	Email from V. Degraffenreid to V. Degraffenreid re ID Analysis attaching DMV ID Matching Report (April 17, 2013)
81.	JA1831 - JA1832	<i>NC Voter ID Bill Moving Ahead with Supreme Ruling</i> , article (June 25, 2013)
82.	JA1833 - JA1867	Email from G. McCue to K. Strach attaching One-Stop Survey Report Data (July 1, 2013)

Tab	JA Page Number(s)	Description
83.	JA1868 - JA1872	Email from G. McCue to K. Strach attaching Analysis of Reducing One-Stop Period: House Bill 451 (July 1, 2013)
84.	JA1873	Press Release re Senate Releases Photo ID Proposal (July 18, 2013)
85.	JA1874	Press Release re Senate Approves Bill Requiring Photo ID to Vote (July 24, 2013)
86.	JA1875 - JA1877	Widespread Voter Fraud Not An Issue in NC, Data Shows, a WKRG.com article (July 25, 2013)
87.	JA1878 - JA1879	<i>Widespread Voter Fraud Not an Issue in NC</i> , a Report by Fox (July 29, 2013)
88.	JA1880	Email from V. Degraffenreid to B. Webb re House Bill 589 & Preregistrations (August 4, 2013)
89.	JA1881 - JA1883	Email from J. Felts to R. Tronovitch and K. Genardo attaching Election Reform One-Pager (August 8, 2013)
90.	JA1884 - JA1885	Email from J. Felts to R. Tronovitch and K. Genardo attaching Election reform One-Pager (August 8, 2013)
91.	JA1886 - JA1889	<i>Blust Says Voting Changes are Meant to Strike a Proper Balance</i> , Doug Clark article (August 21, 2013)
92.	JA1890	Email from K. Strach to T. Forsberg re Registration for 18 Year Old (August 30, 2013)
93.	JA1891	Email from V. Degraffenreid to B. Webb re Change Request (November 14, 2013)

Tab	JA Page Number(s)	Description
94.	JA1892	Email from B. Webb to V. Degraffenreid attaching HB 589 (VIVA) (November 25, 2013)
95.	JA1893 - JA1899	Presentation re 2013 Election Directors Conference: VIVA Update (December 18, 2013)
96.	JA1900 - JA1957	State Board of Elections Presentation to Joint Legislative Elections Oversight Committee (April 2014)
97.	JA1958 - JA1959	<i>Voter Registration in NC</i> , a page from the North Carolina State Board of Elections Website (May 13, 2014)
98.	JA1960 - JA1961	<i>Changing Your Voter Registration in North Carolina</i> , a page from the North Carolina State Board of Elections Website (May 13, 2014)
99.	JA1962 - JA1975	Declaration of Peyton McCrary (May 15, 2014)
100.	JA1976 - JA1978	Survey Report re Requests for Reduction of Cumulative Hours of One-Stop Voting, 2014 Primary
101.	JA1979 - JA2002	Mecklenburg County Board of Elections Early In-Person Voting Project Report
102.	JA2003 - JA2006	Southern Coalition for Social Justice Graph re Total Accepted One-Stop Early Votes
103.	JA2007 - JA2098	<i>Race as a Tool in the Struggle for Political Mastery: North Carolina's 'Redemption' Revisited 1870-1905 and 2011-2013</i> , a Law and Inequality article
104.	JA2099 - JA2100	<i>Governor McCrory Signs Popular Voter ID into Law</i> , a Governor P. McCrory Newsroom Article

VOLUME V

Legislative, Administrative, and Court Documents

Tab	JA Page Number(s)	Description
Legislative Materials Related to North Carolina House Bill 589 (2013)		
<i>Bill Versions</i>		
105.	JA2101 - JA2112	HB 589 as filed (April 4, 2013)
106.	JA2113 - JA2128	HB 589 version 5 (April 8, 2013)
107.	JA2129 - JA2185	HB 589 version 6 (July 23, 2013)
108.	JA2186 - JA2241	HB 589 version 7 (July 24, 2013)
109.	JA2242 - JA2290	HB 589 as ratified (July 26, 2013)
110.	JA2291 - JA2339	HB 589 Session Law version
<i>Amendments</i>		
111.	JA2340	HB 589 House Amendment 7 (July 25, 2013)

Tab	JA Page Number(s)	Description
112.	JA2341	HB 589 House Amendment 8 (July 25, 2013)
113.	JA2342	HB 589 House Amendment 10 (July 25, 2013)
114.	JA2343	HB 589 Senate Amendment 2 (July 24, 2013)
115.	JA2344 - JA2345	HB 589 Senate Amendment 4 (July 24, 2013)
116.	JA2346	HB 589 Senate Amendment 7 (July 24, 2013)
117.	JA2347 - JA2348	HB 589 Senate Amendment 8 (July 24, 2013)
118.	JA2349 - JA2350	HB 589 Senate Amendment 9 (July 24, 2013)
119.	JA2351 - JA2352	HB 589 Senate Amendment 11 (July 24, 2013)
120.	JA2353	HB 589 Senate Amendment 14 (July 24, 2013)
<i>Bill History, Roll Call Votes, and Other Materials</i>		
121.	JA2354 - JA2355	HB 589 Bill History (2013)

Tab	JA Page Number(s)	Description
122.	JA2346 - JA2369	VIVA House Floor Votes
123.	JA2370	HB 589 House Roll Call Vote (April 24, 2013)
124.	JA2371	HB 589 Senate Roll Call Vote (July 25, 2013)
125.	JA2372	HB 589 House Roll Call Vote (July 25, 2013)
126.	JA2373 - JA2387	HB 589 Fiscal Note (July 25, 2013)
<i>Excerpts of Transcripts</i>		
127.	JA2388 - JA2392	House Election Committee Transcript of Proceedings (March 12, 2013)
128.	JA2393 - JA2416	House Election Committee Transcript of Proceedings (March 13, 2013)
129.	JA2417 - JA2423	House Election Committee Transcript of Proceedings (April 3, 2013)
130.	JA2424 - JA2428	House Election Committee Transcript of Public Hearing on Voter Identification (April 10, 2013)
131.	JA2429 - JA2431	House Election Committee Transcript of Proceedings (April 10, 2013)

Tab	JA Page Number(s)	Description
132.	JA2432 - JA2443	House Election Committee Transcript of Proceedings (April 17, 2013)
133.	JA2444 - JA2445	House Appropriations Committee Transcript of Proceedings (April 23, 2013)
134.	JA2446 - JA2451	House Floor Session Transcript of the Proceedings (April 24, 2013)
135.	JA2452 - JA2466	Senate Rules Committee Transcript of Proceedings (July 23, 2013)
136.	JA2467 - JA2483	Senate Floor Session Transcript of Proceedings (July 24, 2013)
137.	JA2484 - JA2504	Senate Floor Session Transcript of Proceedings (July 25, 2013)
138.	JA2505 - JA2626	House Floor Session, Transcript of Proceedings (July 25, 2013)
139.	-	CD enclosing Complete Transcripts of the Proceedings
Other North Carolina Legislative Documents		
140.	JA2627	North Carolina House HB 977 Transcript Roll Call Votes (2001) (April 25, 2001)
141.	JA2628	North Carolina HB 831 House Roll Call Votes (2001) (July 18, 2001)

Tab	JA Page Number(s)	Description
142.	JA2629	North Carolina HB 831 Senate Roll Call Vote (2001) (July 25, 2001)
143.	JA2630	North Carolina SB 836 Senate Roll Call Vote (2001) (July 25, 2001)
144.	JA2631	North Carolina SB 133 Senate Roll Call Vote (2005) (March 1, 2005)
145.	JA2632	North Carolina SB 133 House Roll Call Vote (2005) (February 22, 2005)
146.	JA2633 - JA2640	North Carolina Session Law 2005-2 (Senate Bill 133) (March 2, 2005)
147.	JA2641 - JA2642	North Carolina HB 91 Bill History (2007)
148.	JA2643	North Carolina HB 91 House Roll Call Vote (2007) (July 11, 2007)
149.	JA2644	North Carolina HB 91 Senate Roll Call Vote (2007) (July 11, 2007)
150.	JA2645 - JA2647	North Carolina Session Law 2007-253 (House Bill 91) (July 27, 2007) (K. Strach Deposition Exhibit 43)
151.	JA2648 - JA2649	North Carolina SB 667 (April 4, 2013)
152.	JA2650 - JA2652	Rule 10(b) of the 2013 North Carolina General Assembly House Rules

Tab	JA Page Number(s)	Description
153.	JA2655 - JA2655	North Carolina Senate Demographics for the 150th Session (2013-2014)
154.	JA2653 - JA2654	North Carolina House of Representative Demographics for the 150th Session (2013-2014)
Federal Legislative, Administrative, and Court Documents		
155.	JA2656	Determination of the Attorney General Pursuant to Section 4(b)(1) of the Voting Rights Act of 1965 (August 7, 1965) (30 Federal Register 9897)
156.	JA2657	Department of Commerce Determination of the Director Regarding Voting Rights (31 Fed. Reg. 19) (January 4, 1966)
157.	JA2658 - JA2709	Department of Commerce Determination of the Director Regarding Voting Rights (31 Fed. Reg. 3317) (March 2, 1966)
158.	JA2710 - JA2711	Department of Commerce Determination of the Director Regarding Voting Rights (31 Fed. Reg. 5080) (March 29, 1966)
159.	JA2712 - JA2720	Excerpts from the 117th House of Representatives' Congressional Record (March 23, 1971)
160.	JA2721 - JA2738	S. Rep. No. 92-26 (1971)
161.	JA2739 - JA2741	U.S. Department of Justice Objection Letter, April 21, 1992
162.	JA2742 - JA2744	U.S. Department of Justice Objection Letter, November 16, 1993

Tab	JA Page Number(s)	Description
163.	JA2745 - JA2750	<i>Allen v. City of Evergreen, Alabama (1:13-cv-00107)</i> Order (October 19, 2011)
164.	JA2751 - JA2755	U.S. Department of Justice Objection Letter, April 30, 2012
165.	JA2756 - JA2775	<i>US v. Alameda County, Cal. (3:11-cv-03262)</i> Consent Decree, Judgment, and Order (January 13, 2014)